
**COMPLAINT AND DEMAND FOR TRIAL BEFORE A JURY
IN THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY**

JARROD W. RAMOS v.
402 Armstrong Court,
Apartment B
Laurel, MD 20707

LORI MICHELLE SONDERVAN
2145 Capes Cove Drive
Sherrills Ford, NC 28673

and

Case Number

CAL14-20315

ROBERT COCHRANE DOUGLAS
446 Park Creek Road
Pasadena, MD 21122

and

BRENNAN CHRISTOPHER McCARTHY
1116 West Street, Suite C
Annapolis, MD 21401

Instructions for the Clerk of Court

Please issue three summonses for the above-named defendants and deliver each with the enclosed three processes to the Anne Arundel County Sheriff's Office at:

7 Church Circle, Suite 400
Annapolis, MD 21401

Instructions for the Sheriff

Service can be made on Robert Cochrane Douglas at his above-listed place of abode.

Brennan Christopher McCarthy is an attorney authorized to accept service of process for Lori Michelle Sondervan. He is simultaneously a defendant in this action. Please serve their summonses and two processes on Mr. McCarthy at his above-listed office address.

1. Jarrod W. Ramos ("Plaintiff") is a private citizen residing in Prince George's County. He is not a public figure, nor does he fear the publicity of any truth.
2. Capital-Gazette Communications, LLC is the corporate successor of Capital-Gazette Communications, Inc. (together, "CGC") and publishes *The Capital* newspaper.
3. Thomas Lee Marquardt was employed by CGC as an editor from 1977 to 2012. From 2008 to 2012 he was the publisher of *The Capital*. His acts, omissions, and conduct complained of herein all transpired within the scope of his employment at CGC.
4. Eric Thomas Hartley was employed by CGC as a staff writer and columnist from 2003 to 2012. His acts, omissions, and conduct complained of herein all transpired within the scope of his employment at CGC and with the oversight, direction, and approval of Marquardt.
5. Hartley, Marquardt, and CGC (the "Capital Defendants") are the defendants in Maryland Judiciary case number CAL12-22839, filed in the Circuit Court for Prince George's County. In that action they filed a Rule 2-322 motion and did not claim improper venue.
6. Robert Cochrane Douglas is an attorney of record in CAL12-22839.
7. Brennan Christopher McCarthy filed a complaint as an attorney in the Circuit Court for Prince George's County on June 17, 2014, commencing case number CAD14-15321.
8. Lori Michelle Sondervan has been unemployed since 2012. Since 2011, she has been a student at University of Maryland University College in Adelphi with the option of attending classes at College Park, both in Prince George's County. On or about August 1, 2014, and prior to August 4, 2014, she moved her residence to her parents' home in North Carolina.
9. All acts, omissions, and conduct complained of herein transpired in Maryland.

10. On July 31, 2011, the Capital Defendants published “Jarrod wants to be your friend” (the “Column”) in *The Capital* and online, **Exhibit A**. Plaintiff had pled guilty of the harassment of Sondervan on July 26, 2011, but events did not all occur as stated in the Column.

11. Hartley never requested or left a message for Plaintiff’s comment. Plaintiff’s first awareness of Hartley or the Column came on August 3, 2011. Their first contact is **Exhibit B**.

12. Plaintiff initially sent Sondervan his phone number and e-mail address and invited her to contact him if interested. He did not thank her for anything, but referenced that she used to throw food at him. From her first message, Sondervan repeatedly offered details of her own problems and related sentiments without solicitation. Plaintiff did not share any of his problems with Sondervan until they first spoke on the phone three weeks later.

13. By that time she had already described being diagnosed with bipolar personality disorder and written, “It’s scary realizing you’re not in control of yourself.” After she asked if he might be depressed and he acknowledged this possibility, she stated that she was involuntarily committed for a month after marrying because she “just freaked out.” As he related stories of her attempts to get his attention in high school, she struggled to breathe with anxiety.

14. After a later, hour-long phone conversation, she wrote, “[I]n real life it’s just a handful of people I can talk to for more than a few minutes.” During that conversation she had stated, “I want the people in my life to know so they can understand,” then added, “The guy I’m dating now—I haven’t told him yet. We’re just casual.” What she had just told Plaintiff is that her memory has been damaged by electroconvulsive therapy treatments. She explained she gets confused because her “fast recall” ability is diminished. She referred to herself as a “sick girl.”

15. She afterwards wrote, “Get me drunk talk all night long. That’s a problem too. I avoid going out because alcohol seems to magically cure my anxiety but is detrimental to my

overall mental health." Plaintiff perceived via Facebook that even Sondervan's closest "friends" were unaware of the problems she had shared. Multiple times, however, her non-responsiveness led him to conclude she was not interested in any kind of continuing relationship and would not contact him again. In each instance she returned with more personal details.

16. Plaintiff is highly sensitive to alcohol abuse. He spent excessive amounts of time wondering and worrying about Sondervan. Exasperated, he told her, "I don't care about you or your problems now. I care about myself." Relating this experience to pivotal relationships in his life, nine months later in 2011 he broke down in a grocery store after seeing its liquor section.

17. The Column falsely portrays Plaintiff as psychotic, physically threatening, and as someone who actively seeks out people on the Internet with predatory motives and criminal intent. It falsely conveys he harassed Sondervan with *mens rea* and moral turpitude, and that he is a cowardly and dishonorable person. It falsely transforms his relationship with Sondervan into an allegory for the dangers of the Internet, and makes his person a mascot for the same.

18. Sondervan is psychotic; Plaintiff is not. If he had been contacted by police, he would have ceased his criminal conduct. In her application for criminal charges she wrote, "He says 'in case you're wondering if you need a restraining order, I'm done bothering you now' though the messages continue." He stopped contacting her of his own accord. He explicitly believed his treatment of her in 2010 was just and lawful. His first trusted indication otherwise was when he read the words "COURT ORDERS" of her peace order. He read them on the Maryland Judiciary Case Search website the same night the case was opened, and immediately wrote a letter of consent. He filed it the following morning, in person and before he was served.

19. At the peace order hearing Sondervan swore, "I thought he had stopped contacting me the first time I filed a police report." Rather than express fear or demand court-

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ordered counseling when given the opportunity, she requested Plaintiff be ordered to pay her \$78 and complained, “I’m having to be here … and he doesn’t even have the decency to show up[.]” She only blocked him on Facebook three days after he was charged. During that period he sent her his only message including Facebook screenshots—screenshots he had just taken.

20. Plaintiff explicitly avoids socializing on the Internet. He never actively sought Sondervan prior to their reunion. He wished to meet her in person, but she eventually admitted, “I hide behind the Internet.” When he attempted to have her employment terminated, he identified himself and later told her what he had done. His primary objective was to force self-accountability upon her, and so she be aware of the reason for any consequences she faced.

21. Plaintiff never called Sondervan any vulgar name or asked her for any help, much less “alternately.” “I don’t care if you let your father run your life for 30 years,” was his single statement on her family, though still without solicitation she did offer private details about her parents and her brother’s family. Plaintiff’s only mention of her friends was likewise based on what she had volunteered. He only suggested, “Quit Rotary,” which she has since done. “I take it you’re not at work again and sitting alone at home on your computer right now,” he only commented on her verbally-expressed troubles. There was no “rambling discussion” of these or any other subjects. His coherent theme throughout: “Focus on taking care of yourself.”

22. In May of 2011, the Anne Arundel County State’s Attorney’s Office, by its agents (the “SAO”), enlisted Detective Robert Cremen to investigate Plaintiff and uncover other victims of his harassment. He was unsuccessful because none exist. In reckless disregard, the SAO then solicited the Capital Defendants to publicize Plaintiff’s case, both to uncover the non-existent other victims and to injure Plaintiff in retaliation for his harassment. Despite the absence of

factual support, Marquardt ordered Hartley to write the Column anyway because in his reckless news judgement the false light was true and he wanted the public to know it.

23. Hartley avoided contacting Plaintiff and overrepresented his effort to obtain Plaintiff's comment. Hartley was consciously aware of the likelihood that contacting Plaintiff would have resulted in receiving information contrary to his preconceived false storyline.

24. Plaintiff wrote to Sondervan, "Have another drink and go hang yourself, you cowardly little lush." He then sent an e-mail to Sondervan's employer titled "Fire Lori Sondervan," in which he called her a "bipolar drunkard leading a double life" and provided supporting evidence. Upon receiving this e-mail, an HR Director telephoned Plaintiff. After this conversation with Plaintiff, the person placed Sondervan on probation. This entire sequence of events was known to Hartley, yet he refused to question the credibility or motive of Sondervan.

25. Summarizing her application for charges before Plaintiff's guilty plea, Sondervan wrote, "Mr. Ramos 'sounded nuts' so [the HR Director] hung up the phone." She possessed actual knowledge this was false. She desired to falsely portray Plaintiff as a lunatic to conceal the fact she is a sick girl, and to retaliate for his harassment and true but unflattering statements.

26. At the conclusion of Plaintiff's sentencing, Assistant State's Attorney Mary Virginia Miles said to Sondervan, "Come with me. We're going to take a walk outside," and surprised her with the fact of Hartley's presence. Miles then said, "Come on with me and I'll—you can talk to him." During the ensuing interview, Hartley received information refuting what he had just witnessed Sondervan say. Sondervan, the SAO, and the Capital Defendants reached an unlawful agreement or understanding (the "Conspiracy") to vengefully injure Plaintiff.

27. On November 14, 2011, the Court struck Plaintiff's conviction and granted probation before judgement. Sondervan falsely claimed years of sleepless nights, only remedied

by Plaintiff's probation. When the Court explained Plaintiff would remain on probation and added, "But I don't want to cost him his job with the federal government," Sondervan persisted.

28. That evening, Plaintiff made his first public statement on his case (Ex. A, p. 3). The next day, Hartley voted the comment thumbs-down and CGC censored it from view. Plaintiff contacted Hartley; Marquardt; and CGC's Interactive Media Editor, Nick Lundskow, Exhibit C, and received no answer.

29. On November 20, 2011, Plaintiff began publication of a personal website to rival the false publicity of the Column, which was a prominent result when searching for his name. The next day, Douglas left a message at Plaintiff's home: "Hi, Mr. Ramos? I'm Bob Douglas. I'm an attorney with the Capital-Gazette newspapers. Can you give me a call at my office, which is 410-580-4141? They forwarded to me your material, and I just want to chat with you about it. Thanks a lot. Bye-bye." Plaintiff contacted Douglas, **Exhibit D**, and received no answer.

30. On February 24, 2012, Sondervan obtained a final peace order against Plaintiff after a contested hearing. She grinned, quivered, and scrunched her body after hearing a probation report would be submitted. On April 27, 2012, he was charged with a violation of probation as a result. On May 1, 2012, Sondervan greeted Plaintiff with a puffed sigh while lowering her head with a hunched neck. The peace order was then denied on appeal. The circuit court found there was nothing to even suggest Sondervan was entitled to a new peace order.

31. Due to Sondervan's contradictory statements, a District Court commissioner accepted Plaintiff's application for perjury charges, **Exhibit E**. The SAO simultaneously dismissed the charges against Plaintiff and Sondervan in two separate courtrooms to prevent his objection. At the February peace order hearing Sondervan also referred to Hartley as "somebody I know." The Court observed she "described him in [her] testimony as a friend of [hers]."

32. Hartley was present at the May appellate hearing. At its conclusion, he left the otherwise empty courtroom with Sondervan and her attorney, McCarthy. Hartley had witnessed Plaintiff's sister testify about e-mails contradictory to the Column, yet made no inquiry. The Capital Defendants have not reported on Plaintiff or Sondervan since November 17, 2011.

33. On or about November 22, 2011, Douglas joined in the Conspiracy, which took on an expanded purpose of also derailing Plaintiff's threatened lawsuit. Causing Plaintiff's probation to be revoked was specifically discussed. The "somebody else" who "found" Plaintiff's website and sent it to Sondervan was one of her co-conspirators.

34. The primary basis of Sondervan's second peace order application was a claim Plaintiff had attempted to access her medical records at the Oasis counseling center she had previously referred him to. All of her information was hearsay provided by Oasis staff. In a later letter to the Office of the Attorney General, the Oasis Practice Administrator admitted Plaintiff's request had been for non-confidential e-mail printouts that were in his own file.

35. On some date from February 24, 2012 to May 1, 2012, McCarthy joined in the Conspiracy. He represented Sondervan with actual knowledge her allegations were fraudulent. He produced no other witness and repeatedly attempted to admit a letter that had been excluded as hearsay. He did not subpoena the letter's author because he knew the claim was fraudulent. At the hearing's conclusion, he interrupted Plaintiff speaking to a clerk to tell him, "Shut up." His representation was motivated by a desire to injure Plaintiff and an independent goal of receiving favorable, profitable publicity from the Capital Defendants.

36. The Oasis letter to the Office of the Attorney General also stated since they had not yet been served with "lawful process that would have created a legal duty to maintain or preserve" the e-mails requested by Plaintiff, they had destroyed them. This occurred even after

Plaintiff warned Oasis the e-mails were of evidentiary value in CAL12-22839. Oasis was in related contact with Sondervan, including via Twitter, and destroyed the e-mails at her request. Sondervan subsequently deleted her Twitter account to further obstruct the discovery process.

37. After Marquardt was served process in CAL12-22839, Douglas proposed he and the Capital Defendants all lie to claim insufficiency of process on the basis of missing papers. They all agreed. In their Rule 2-322 motion and with actual knowledge of falsity, Douglas wrote, "A copy of the July filing was discovered by counsel for Defendants when he reviewed the file in the clerk's office after service of the October Complaint was made." Because he recognized his personal exposure, he did this even knowing one process had not yet been served.

38. Hartley gave a false identity when served process in CAL12-22839. The server erroneously believed she had served a co-tenant until she was later shown Hartley's picture.

39. When they first met, Plaintiff asked Douglas, "What did you want when you called me?" After Douglas pretended to not understand and Plaintiff repeated himself, Douglas said, "That's neither here n[or there]," stopped, sighed while shaking his head, and changed the subject. Douglas had intended to falsely deny calling Plaintiff and was frustrated by his mistake.

40. In a motion in the Court of Special Appeals, Plaintiff said Douglas faces criminal and civil liability, explaining: "Not only was [his and the Capital Defendants'] fraud scheme contemptuous of the dignity and authority of the court, but also an agreement to knowingly swear to corruptly false testimony of material fact. There is no statute of limitations for perjury, nor conspiracy to perpetrate the same. In addition, I now consider Mr. Douglas to be a joint tortfeasor." Douglas filed an untimely response without denying or even responding to this.

41. On April 4, 2013, McCarthy agreed to serve as Sondervan's designated legal counsel, stating, "I got myself into this." He then said he will "slaughter" Plaintiff.

42. Plaintiff has warned Douglas and McCarthy they are proceeding as advocate witnesses. Both have chosen this impropriety because they know any other attorney would be ethically and professionally obligated to take action adverse to the Conspiracy.

43. In June of 2014, Plaintiff's former team lead at the Bureau of Labor Statistics recruited him to join his company. His job offer, which represented an increased salary, was withdrawn with the explanation: "I discussed your issue with my Program Manager and Director to give them full disclosure of your ongoing legal battles. It was decided that we cannot bring you onboard at this time. I'm confident that had you not been in a legal battle, the outcome would certainly be different. When you get through this and win your battles, we can certainly revisit the opportunity[.]" All of Plaintiff's legal battles are a consequence of the below counts.

44. Plaintiff has incurred fees and expenses as a consequence of the below counts.

45. Douglas and McCarthy have both stated Plaintiff was "upset" by the Column.

46. Plaintiff has sworn a legal oath he would like to kill Hartley, and he still would.

47. Being charged with a VOP also upset Plaintiff, with physical manifestations.

48. In 2000, a jury found that Marquardt and CGC had maliciously defamed attorney John R. Greiber. They awarded a \$2.5 million verdict that did not withstand remittitur, but also did not include punitive damages. Marquardt called the jury's verdict "a sign of the times."

49. In 2009, the Capital Defendants published that attorney Louis P. Tanko had been "suspended [60 days] for misconduct, lying." Hartley's report acknowledged the falsity of this statement. Tanko sued Hartley and CGC and ultimately reached a settlement that included a retraction. The headline was reduced to "Lawyer suspended," though "Lawyer suspended for misconduct" was true. Tanko was later suspended indefinitely for unauthorized practice of law, which the Capital Defendants did not report. The Column was published during Tanko's suit.

50. On July 3, 2012, Lundskow's official staff blog personally addressed Plaintiff, explaining CGC's standards: "It's largely open season on public figures, convicted criminals[.]"

51. On August 6, 2012, Marquardt published a column online, stating that his "Letter writers feast on giving grief." He edited this to "Want to get grief?" On May 13, 2012, he had already referred to news subjects as "targets" and being edited for taste a "killjoy."

52. On August 24, 2012, Plaintiff named Lundskow in a criticism of CGC's practices and "open season" sentiment. He responded that Plaintiff "doesn't believe in the justice system of this county, state, or country. The media plays a well-established part of that system[.]"

53. On September 20, 2012, Lundskow deleted a comment made by Plaintiff at CGC's website, purely out of personal spite. On September 27, 2012, Plaintiff was banned from commenting at CGC's website, though he had never violated any stated rule or policy.

54. On October 4, 2012, Plaintiff faxed a letter to the editor, **Exhibit F**, for publication in *The Capital*. Though CGC's stated policy was to publish all letters that followed their posted rules, the letter was not published. It did not violate any stated rule. On November 12, 2012, Plaintiff's second letter to the editor, **Exhibit G**, was published in *The Capital*.

COUNT 1 – Invasion of Privacy

55. Paragraphs 1 through 54 are here adopted by reference.

56. The Capital Defendants purposely gave publicity to a matter concerning Plaintiff.

57. They so recklessly or knowingly placed Plaintiff before the public in a false light.

58. Plaintiff is highly offended by this false light, as a reasonable person would be.

59. The Capital Defendants so acted in furtherance of the Conspiracy.

60. Sondervan encouraged, incited, aided, or abetted the Capital Defendants.

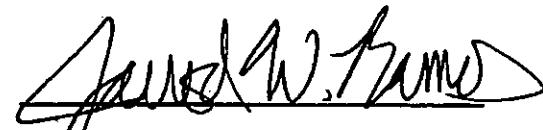
COUNT 2 – Malicious Use of Process

61. Paragraphs 1 through 60 are here adopted by reference.
62. Sondervan, without probable cause, instituted a civil action against Plaintiff.
63. She so instituted the action with personal malice or improper motive.
64. She so inflicted special injury upon Plaintiff that was not a necessary result.
65. The action terminated in favor of Plaintiff.
66. Sondervan so acted in furtherance of the Conspiracy.
67. McCarthy encouraged, incited, aided, or abetted Sondervan.

Plaintiff therefore claims entry of judgement against Sondervan, Douglas, and McCarthy, jointly and severally, and jointly with the Capital Defendants via case number CAL12-22839, for:

- Actual damages in excess of seventy-five thousand dollars.
- Punitive damages in excess of seventy-five thousand dollars.
- Post-judgement interest and costs of this action.
- Any other or further relief as this Court deems proper.

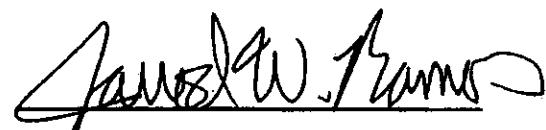
Respectfully submitted,



Jarrod W. Ramos
402 Armstrong Court, Apt. B
Laurel, MD 20707
301-604-4877

Demand for Trial before a Jury

I, the above named Plaintiff, do hereby demand this action be tried by jury.



Jarrod W. Ramos

Case No. C-02-CR-18-1515

Plaintiff's/State
 Defendant's Exhibit
 Court's
 Joint

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